



# MEMO ENDORSED

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February 11, 2021

Hon. Valerie Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 240  
New York, New York 10007

Re: Headley v. Universal Music Group, Inc. et al. – 20-cv-11120-VEC

Dear Judge Caproni:

I am counsel for defendant UMG Recordings, Inc. (“UMG”), incorrectly sued herein as Universal Music Group, Inc. and Republic Records, Inc. I write to respectfully request an adjournment of the Initial Pretrial Conference that is currently scheduled for February 19, 2021. The adjournment will give Defendants additional time to engage outside litigation counsel and review the parties’ proposed pre-conference submissions, and also to investigate and seek a resolution of this matter.

Plaintiff’s complaint was filed on December 31, 2020. UMG and co-defendant Cash Money Records, Inc. (“Cash Money”) were served on January 11 and January 13, 2021, respectively, and both were granted an extension to respond to the complaint until March 3, 2021. Defendants Onika Tanya Maraj-Petty p/k/a Nicki Minaj (“Minaj”) and Tokyo Ninja, LLC (“Tokyo Ninja”) were served on January 16, 2021 and were granted an extension to respond to the complaint until March 10, 2021. I understand that co-defendant Young Money Entertainment, Inc. has not yet been served. On February 8, 2021, Plaintiff’s counsel sent an email to Defendants’ counsel with a draft of the joint letter and proposed case management plan. UMG and Cash Money are in the process of engaging outside litigation counsel and thus have been unable to comment on the proposed submissions.

UMG thus respectfully requests a brief adjournment of the February 19 conference so it can retain outside litigation counsel and substantively comment on the proposed submissions. UMG proposes that the conference be reset to either March 12, 2021, March 19, 2021, or March 26, 2021, and that the parties’ pre-conference letter and draft case management plan be filed no later than eight days before the rescheduled conference. All counsel in this matter (copied here)

have consented to the adjournment. This is the first request to adjourn this conference. I also apologize to the Court for filing this request the same day the joint letter and proposed case management plan is due. I was unable to file this request yesterday as the Court's CM/ECF system was down and did not come back online until this morning. Thank you.

Very Truly Yours,



Nicholas J. Tardif

cc: Stephen Drummond, Esq. (via ECF)  
Daniel J. Aaron, Esq. (via ECF)  
Joshua Rosenberg, Esq. (via ECF)  
Edward R. Grauer, Esq. (via email) (counsel for Cash Money Records, Inc.)

Application GRANTED. The initial pretrial conference currently scheduled for Friday, February 19, 2021 is hereby adjourned to **Friday, March 19, 2021, at 9:30 A.M.** Pre-conference submissions are due no later than **Thursday, March 11, 2021.** For the conference dial in information and a description of the requirements for the pre-conference submissions, the parties should consult the notice of initial pretrial conference at docket entry 5.

SO ORDERED.



Date: February 11, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE